

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

JOSEPH ARCHAMBAULT,

Plaintiff

v.

LIBERTY LIFE ASSURANCE COMPANY OF
BOSTON

Defendant

Civil Action No. 05-11762-NG

DECLARATION OF PAULA MCGEE

I, Paula McGee, do hereby under oath depose and say as follows:

1. I am over the age of eighteen and am a resident of the State of Florida. I am fully competent to testify as to the matters set forth in this affidavit, which are true and correct based upon my own personal knowledge, unless indicated to the contrary.

2. I am currently employed as the Litigation Manager for Liberty Life Assurance Company of Boston ("Liberty Life") and have been since 1999.

3. Liberty Life entered into a Group Disability Income Policy with Plaintiff's employer, Sodexho Marriott Services, Inc. ("Sodexho") which provided to Sodexho's employees long term disability benefits through a policy of insurance -- policy no. GF3-810-252576-01 ("the Policy"). Liberty Life issued the Policy and is the insurer for long-term disability benefits under the Policy. The long term disability plan is an ERISA welfare benefit plan.

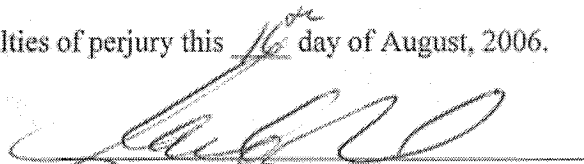
4. As part of my duties as Litigation Manager, I am responsible for maintaining records of claims and administrative appeals of beneficiaries under Liberty Life's policies.

5. In addition, as part of my duties as Litigation Manager, I am familiar with the documents governing the administration of policies issued by Liberty Life and maintain copies of the policy documents in my control.

6. I certify that an authentic copy of that policy governing Plaintiff's claim for long term disability benefits is a part of the Administrative Record (at pages 00001-00032) was submitted for filing with the Court by counsel for Liberty Life in this matter. I understand that the authentic copy of the policy was filed with the Court by Liberty Life's attorneys in this case on or about April 14, 2006.

7. I further certify that an authentic copy of the entire Administrative Record regarding Plaintiff's claim and appeal was submitted for filing with the Court by counsel for Liberty Life in this matter. I understand that the authentic copy of the entire Administrative Record was filed with the Court by Liberty Life's attorneys in this case on or about April 14, 2006, and is contained at pages 00001-00740 of the documents filed on April 14, 2006.

Signed under the pains and penalties of perjury this 16th day of August, 2006.


Paula McGee, Litigation Manager

CERTIFICATE OF SERVICE

I hereby certify that on August 18 2006, a copy of the foregoing was served by electronic mail and through the ECF system on Plaintiff's counsel.

/s/ Guy P. Tully
Jackson Lewis LLP